

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

JUL 16 2001

CLERK, U.S.D.C., DALLAS, TX  
By \_\_\_\_\_  
LAWRENCE

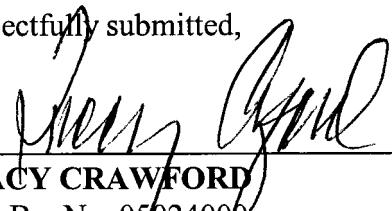
GENERAL MOTORS CORPORATION §  
§  
Plaintiff, §  
§  
v. §  
§  
§  
AMERICAN ECOLOGY §  
ENVIRONMENTAL SERVICES CORP. §  
f/k/a GIBRALTAR CHEMICAL §  
RESOURCES, INC. AND AMERICAN §  
ECOLOGY CORP. §  
Defendants. §

CIVIL ACTION NO. 3-99CV2625-L

DEFENDANTS' TRIAL EXHIBIT LIST

Pursuant to the Court's December 12, 2000 Revised Scheduling Order, Defendants, American Ecology Environmental Services Corporation f/k/a Gibraltar Chemical Resources, Inc. and American Ecology Corporation, submit the following list of exhibits which they may introduce into evidence at the trial of this case.

Respectfully submitted,

  
\_\_\_\_\_  
TRACY CRAWFORD  
State Bar No. 05024000

ROSEMARY SAGE JONES  
State Bar No. 17519275

R. BRIAN CRAFT  
State Bar Card No. 04972020

**RAMEY & FLOCK, P.C.**  
500 First Place  
P. O. Box 629  
Tyler, Texas 75710  
903/597-3301  
FAX: 903/597-2413

ATTORNEYS FOR AMERICAN ECOLOGY  
ENVIRONMENTAL SERVICES CORPORATION AND  
AMERICAN ECOLOGY CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was hand-delivered to Mr. Kirk F. Sniff, Ms. Karen Brown Willcutts and Ms. Ashley T. Kisner, Plaintiffs' counsel of record, on this the 16<sup>th</sup> day of July, 2001.

Ingrid S. Young  
Ingrid S. Young  
Legal Assistant to Tracy Crawford

**DEFENDANTS' TRIAL EXHIBITS**

1. Environmental Resources Management, Inc. Commercial Hazardous Waste Facility Evaluation on Gibraltar Chemical Resources for 08/23/85 inspection  
Bates Stamp Nos. P 01664 - P 01790
2. General Motors Corporation Plant Environment Environmental Activities Staff Transporter and Waste Management Facility Evaluation for 05/01/87 Visit to GCR  
Bates Stamp Nos. P 01822 - P 01833
3. General Motors Corporation Plant Environment Environmental Activities Staff Transporter and Waste Management Facility Evaluation for 11/21/88 Visit to GCR  
Bates Stamp Nos. P 01834 - P 01848
4. General Motors Corporation Argonaut AEC Waste Management Services Hazardous Waste Management Facility Summary for 03/16 - 17/89 Visit to GSX Services of SC, Inc.  
Bates Stamp Nos. P 01807 - P 01812
5. 08/04/89 Karen M. Bozman (ENSR) letter to Betty Schnack (GCR) re: Waste Site Inspection Group (WSIG) TSDF Audit Program with Attachments A - C  
Bates Stamp Nos. GM 001392 - 001403
6. 09/20/89 General Motors Corporation Corporate Purchase Agreement No. 3837 with Gibraltar Chemical Resources, Inc.  
Bates Stamp Nos. GM 000315 - 000370
7. General Motors Corporation Argonaut AEC Waste Management Services Hazardous Waste Management Facility Summary for 10/24/89 Visit to GCR  
Bates Stamp Nos. P 01813 - P 01821
8. 01/90 ENSR Consulting and Engineering, Inc. Waste Facility Audit of Gibraltar Chemical Resources, Inc.2 prepared for The Waste Site Inspection Group  
Bates Stamp Nos. P 03016 - P 03781
  - a. Volume 1
  - b. Volume 2
9. 03/01/90 T.L. Grisham (GCR) letter to Brian Bond (GM) regarding Gibraltar Chemical Resources, Inc. certification no General Motors waste will be deep well injected  
Bates Stamp No. GM 000228
10. General Motors Corporation Plant Environment Environmental Activities Staff Transporter and Waste Management Facility Evaluation for 03/01/90 Visit to GCR  
Bates Stamp Nos. P 01791 - P 01803

11. 07/10/90 Larry Camilleri (GM) letter to Hazardous Waste Contractors regarding reporting requirement for 1990 - 1<sup>st</sup> half  
Bates Stamp No. GM 000561
12. 08/22/90 handwritten note regarding Larry Camilleri/Larry Cottrell  
Bates Stamp Nos. GM 000550A
13. 09/25/90 Lawrence Camilleri (GM) letter to Tom L. Grisham (GCR) regarding General Motor's counter offers and comments to 09/06/90 letter  
Bates Stamp Nos. GM 000441 - 000442
14. 11/01/90 General Motors Corporation Corporate Purchase Contract No. 3837 Amendment No. 1  
Bates Stamp Nos. P 04905 - P 04906
15. 12/12/90 Lawrence Camilleri (GM) letter to Tom Grisham (GCR) regarding Gibraltar Chemical Resources, Inc. certificate of insurance for 1991  
Bates Stamp Nos. GM 000234 - 000235
16. 12/20/90 Lawrence Camilleri (GM) letter to Tom Grisham (GCR) regarding Gibraltar Chemical Resources, Inc. certificate of insurance for 1991  
Bates Stamp No. GM 000440
17. 07/17/91 General Motors Corporation Corporate Purchase Contract No. 3837 Amendment No. 2  
Bates Stamp Nos. P 04907 - P 04916
18. General Motors Corporation Argonaut AEC Waste Management Services Hazardous Waste Management Facility Summary for 11/14/91 Visit to GCR  
Bates Stamp Nos. P 01804 - P 01806
19. 10/05/92 Lawrence Camilleri (GM) letter to Tom Grisham (GCR) regarding 07/01/91 - 12/31/91 and 01/01/92 - 07/01/92 Gibraltar Chemical Resources, Inc. sales activity reports  
Bates Stamp No. 000204
20. 08/11/93 General Motors Corporation Corporate Purchase Contract No. 3837 Amendment No. 3 with Exhibit G - Mobley Environmental Services, Inc. Continuing Guaranty  
Bates Stamp Nos. P 04917 - P 04918
21. 09/93 Gibraltar Chemical Resources, Inc. Facility Audit Information  
Bates Stamp Nos. P 01874 - P 02174

22. 09/09/93 General Motors Corporation Corporate Purchase Contract No. 3837 Amendment No. 4  
Bates Stamp Nos. P 04919 - P 04920
23. 03/30/94 Elizabeth Milbrath (Radian) letter to Chuck Wyrick forwarding 03/94 audit report regarding 11/18/93 Gibraltar Chemical Resources, Inc. inspection  
Bates Stamp Nos. P 02175
24. 03/94 Radian Corporation Hazardous Waste Facility Audit & Risk Assessment of Gibraltar Chemical Resources, Inc. prepared for The Waste Site Inspection Group  
Bates Stamp Nos. P 02176 - P 03015
  - a. Volume I: Summary Report
  - b. Volume II: Audit Check & Supporting Documents
25. 09/29/95 Stephen L. Mobley (AEC) letter to Lawrence Camilleri (GM) regarding changing GM Corporate Purchase Agreement No. 3837 to reflect acquisition of GCR by AEC  
Bates Stamp Nos. GM 000371 - 000383
26. 11/27/95 General Motors Corporation Corporate Purchase Contract No. 3837 Amendment No. 5  
Bates Stamp Nos. P 04921 - P 04923
27. 08/16/96 Lawrence Camilleri (GM) letter to Robert L. Marchand (AEC) regarding General Motors Corporation Corporate Purchase Contract No. 3837 Amendment  
Bates Stamp No. P 04924
28. 08/16/96 General Motors Corporation Corporate Purchase Contract No. 3837 Amendment No. 7  
Bates Stamp Nos. P 04925 - P 04926
29. American Ecology Corporation Certificates of Insurance:
  - a. 04/20/95 Bates Stamp Nos. GM 000381 - 000383
  - b. 09/11/95 Bates Stamp Nos. GM 000378 - 000380
30. 06/12/97 Linda W. Kriss (Johnson & Higgins) letter to Toni Graham (AEC) regarding Zurich response to adding additional insureds on AEC policies  
Robert Trimble Deposition Exhibit No. 6
31. Affidavit of Toni Graham attached to Joint Response to GM's Motion for Summary Judgment (and Counter-Motion for Summary Judgment) and Brief in Support of (1) Joint Response to GM's Motion for Summary Judgment and (2) The Defendants' Counter-Motion for Summary Judgment
32. 10/24/96 Plaintiffs' Second Amended Original Petition in *Adams* litigation

33. Plaintiffs' Third Amended Petition in *Adams* litigation:
  - a. 06/18/99 Plaintiffs' Third Amended Petition
  - b. 08/13/99 Plaintiff's Supplement to Third Amended Petition
34. 08/15/97 Steven L. Dickerson (Strasburger & Price) letter to Charles E. Brown (GM) regarding circulation of "Settlement Authority" form in *Adams* litigation  
Bates Stamp Nos. P 04999 - P 05002
35. 05/26/98 Steven L. Dickerson (Strasburger & Price) status report letter to Charles E. Brown (GM) regarding settlement discussions in *Adams* litigation  
Bates Stamp Nos. P 05003 - P 05005
36. 11/24/98 Steven L. Dickerson (Strasburger & Price) redacted Status Report to Charles E. Brown (GM) in *Adams* litigation  
Bates Stamp Nos. P 05006 - P 05009
37. 12/07/98 Steven L. Dickerson (Strasburger & Price) letter to Charles E. Brown (GM) regarding settlement negotiations in *Adams* litigation  
Bates Stamp No. P 05010
38. 04/21/99 Kirk F. Sniff (Strasburger & Price) letter to Phillip Chattin (AEC) scheduling meeting regarding indemnifying General Motors
39. 05/03/99 Kirk F. Sniff (Strasburger & Price) letter to Howard Rose (MESI) and Phillip Chattin (AEC) regarding indemnifying General Motors  
Bates Stamp Nos. GM-Adams Corres. 000001 - 000004
40. 05/13/99 Robert C. Hilliard (Hilliard & Munoz) letter to Kirk F. Sniff (Strasburger & Price) regarding continuing settlement negotiations with General Motors  
Bates Stamp No. P 01306
41. 06/07/99 Robert C. Hilliard (Hilliard & Munoz) letter to Kirk F. Sniff (Strasburger & Price) regarding \$1,500,000.00 settlement demand to General Motors  
Bates Stamp No. GM-Adams Corres. 000008
42. 06/11/99 Artis M. Noel (GM) letter to Zurich Insurance Company and Willis Coroon Marine & Energy/Americas, Inc. regarding indemnifying General Motors  
Bates Stamp Nos. GM-Adams Corres. 000005 - 000007
43. 06/15/99 Robert C. Hilliard (Hilliard & Munoz) letter to Kirk F. Sniff (Strasburger & Price) regarding General Motors settlement offer deadline  
Bates Stamp No. P 05013

44. 06/16/99 Kirk F. Sniff (Strasburger & Price) letter to Art Noel (GM) regarding Texaco settlement Rule 11 Agreement in *Adams* litigation  
Bates Stamp Nos. P 05011 - P 05012
45. 06/18/99 Artis M. Noel (GM) letter to Zurich Insurance Company and Willis Coroon Marine & Energy/Americas, Inc. following-up to 06/11/99 letter  
Bates Stamp Nos. P 04967 - P 04971
46. 06/29/99 Rosemary Jones (Strasburger & Price) letter to Artis Noel (GM) regarding clients declining GM indemnity claims  
Bates Stamp No. GM-Adams Corres. 000009
47. 06/30/99 Artis M. Noel (GM) letter to Rosemary Jones regarding decision to refuse to indemnify General Motors  
Bates Stamp Nos. GM-Adams Corres. 000010 - 000011
48. 07/02/99 Artis M. Noel (GM) letter to Zurich Insurance Company and Willis Coroon Marine & Energy/Americas, Inc. regarding third request to indemnify General Motors  
Bates Stamp Nos. P 04975 - P 04976
49. 07/12/99 Kirk F. Sniff (Strasburger & Price) letter to Rosemary Jones responding to 06/29/99 letter  
Bates Stamp Nos. GM-Adams Corres. 000012 - 000017
50. 07/20/99 Ali Hyderi (Zurich) letter to Artis Noel (GM) regarding receipt of request for coverage under PLC Policy 6820850 issued to American Ecology Corporation  
Bates Stamp Nos. P 04983 - P 04984
51. 07/22/99 Kirk F. Sniff (Strasburger & Price) draft redacted status report letter to Art Noel (GM) regarding settlement negotiations in *Adams* litigation  
Bates Stamp Nos. P 05014 - P 05021
52. 07/27/99 Kirk F. Sniff (Strasburger & Price) letter to Robert C. Hilliard (Hilliard & Munoz) regarding GM settlement in *Adams* litigation  
Bates Stamp Nos. P 01310 - P 01311
53. 08/02/99 Kirk F. Sniff (Strasburger & Price) letter to Charles E. Brown (GM) regarding settlement of *Adams* litigation  
Bates Stamp No. P 05022
54. 08/10/99 Ashley T. Kisner (Strasburger & Price) letter to Art Noel and Andy Segovia (GM) regarding draft Settlement Agreement in *Adams* litigation  
Bates Stamp No. P 05023

55. 08/13/99 Kirk F. Sniff (Strasburger & Price) letter to Howard Rose (MESI) and Phillip Chattin (AEC) regarding 08/18/99 deadline to indemnify General Motors  
Bates Stamp Nos. GM-Adams Corres. 000018 - 000019
56. 09/29/99 Ali Hyderi (Zurich) letter to Artis Noel (GM) regarding receipt of 09/03/99 letter  
Bates Stamp Nos. P 04985 - P 04986
57. 10/12/99 Ashley T. Kisner (Strasburger & Price) letter to Art Noel and Andy Segovia (GM) regarding most recent version of settlement and release documents in *Adams* litigation  
Bates Stamp No. P 05024
58. 11/04/99 Ashley T. Kisner (Strasburger & Price) letter to Art Noel (GM) regarding most recent version of settlement and release documents in *Adams* litigation  
Bates Stamp No. P 05025
59. 11/04/99 Ashley T. Kisner (Strasburger & Price) letter to Delwin E. Hervey (Vinson & Elkins) regarding General Motor's agreement with most recent version of Settlement Agreement with revision on page 2 in *Adams* litigation  
Bates Stamp Nos. P 04803 - P 04805)
60. 11/29/99 *Adams, et al v. AEEESC, et al* General Release (First Group of Settling Defendants)  
Bates Stamp Nos. P 01192 - P 01210
61. 01/10/00 *Adams, et al v. AEEESC, et al* Amended Final Judgment  
Bates Stamp Nos. P 04373 - P 04431
62. 01/10/00 Ashley T. Kisner (Strasburger & Price) letter to Art Noel (GM) regarding settlement prove-up hearing in *Adams* litigation  
Bates Stamp Nos. P 05026 - P 05027
63. 01/11/00 Ashley T. Kisner (Strasburger & Price) letter to Art Noel (GM) regarding wiring settlement amounts for *Adams* litigation  
Bates Stamp Nos. P 05028 - P 05030
64. 01/14/00 Ashley T. Kisner (Strasburger & Price) letter to Art Noel (GM) regarding wiring ad litem fee for *Adams* litigation  
Bates Stamp Nos. P 05031 - P 05032
65. 01/19/00 *Adams, et al v. AEEESC, et al* Order regarding prove-up of guardian ad litem's attorney's fees allocated to General Motors  
Bates Stamp Nos. P 04822

66. 11/03/00 Kirk F. Sniff (Strasburger & Price) letter to R. Brian Craft (Ramey & Flock) regarding attorney-client privilege for *Adams* litigation (Noel Deposition Exhibit No. 2)
67. Plaintiff General Motors Corporation's Responses to Defendant American Ecology Corporation's First Set of Interrogatories to Plaintiff
68. Plaintiff General Motors Corporation's Supplemental Responses to Defendant American Ecology Corporation's First Set of Interrogatories to Plaintiff
69. Plaintiff General Motors Corporation's Responses to Defendant American Ecology Corporation's First Request for Production of Documents
70. Plaintiff General Motors Corporation's Responses to Defendant American Ecology Environmental Services Corporation's First Set of Interrogatories to Plaintiff
71. Plaintiff General Motors Corporation's Supplemental Responses to Defendant American Ecology Environmental Services Corporation's First Set of Interrogatories to Plaintiff
72. Plaintiff General Motors Corporation's Responses to Defendant American Ecology Environmental Services Corporation's First Request for Production of Documents
73. Defendant American Ecology Corporation's Responses to Plaintiff's First Set of Requests for Admissions
74. Defendant American Ecology Corporation's Objections and Amended Responses to Plaintiff's First Set of Interrogatories
75. Defendant American Ecology Corporation's Objections and Amended Responses to Plaintiff's Second Set of Interrogatories
76. Defendant American Ecology Corporation's Objections and Amended Responses to Plaintiff's Second Request for Production of Documents
77. Defendant American Ecology Corporation's Objections and Amended Responses to Plaintiff's Third Request for Production
78. Defendant American Ecology Environmental Services Corporation's Objections and Amended Responses to Plaintiff's First Set of Requests for Admissions
79. Defendant American Ecology Environmental Services Corporation's Objections and Responses to Plaintiff's Second Set of Requests for Admissions

80. Defendant American Ecology Environmental Services Corporation's Objections and Amended Responses to Plaintiff's First Set of Interrogatories
81. Defendant American Ecology Environmental Services Corporation's Objections and Amended Responses to Plaintiff's First Request for Production of Documents
82. Defendant American Ecology Environmental Services Corporation's Objections and Amended Responses to Plaintiff's Second Request for Production of Documents
83. Deposition of Lawrence Camilleri
84. Deposition of Larry Cottrell
85. Deposition of Davis Ford
86. Deposition of Rowland Foster
87. Deposition of Allen Messenger
88. Deposition of John Mobley
89. Deposition of Artis Noel
90. Deposition of Steven Russell
91. Deposition of Robert M. Trimble
92. Deposition of Mitchael Wilson
93. Deposition of Charles Wyrick
94. Curriculum Vitae of Allen Messenger
95. Allen Messenger's 07/20/00 Preliminary Report of Expert Testimony
96. Allen Messenger's 09/25/00 Report of the Review of Davis L. Ford's August 23, 2000 Report
97. Curriculum Vitae of Steven Russell
98. Steven L. Russell's 08/28/00 Report
99. Curriculum Vitae of Mitcheal D. Wilson

100. 07/19/00 Report of Mitcheal D. Wilson
101. Mitcheal D. Wilson's 09/25/00 Report regarding Environmental Compliance Issues at the AEESC Hazardous Waste Treatment and Disposal Facility - Winona, Texas
102. Attorney Payment Ledgers
  - a. 01/01/80 - 04/13/00 Strasburger & Price Bill and Payment Ledger in *Adams* litigation  
Bates Stamp Nos. P 00001 - P 00004
  - b. 01/01/80 - 04/13/00 Strasburger & Price Bill and Payment Ledger in *Gibraltar* litigation - Bates Stamp No. P 00005
  - c. 04/14/00 Zurich International Time Recap Summary by Timekeeper - Bates Stamp Nos. P 00006 - 00007
103. Strasburger & Price Law Firm Invoices in *Adams* litigation
  - a. 09/18/96 - 11/30/96 Bates Stamp Nos. P 01335 - P 01343
  - b. 12/03/96 - 01/13/97 Bates Stamp Nos. P 01344 - P 01345
  - c. 02/06/97 - 02/28/97 Bates Stamp Nos. P 01346 - P 01347
  - d. 03/04/97 - 03/31/97 Bates Stamp Nos. P 01348
  - e. 04/04/97 - 04/30/97 Bates Stamp Nos. P 01349
  - f. 05/01/97 - 05/31/97 Bates Stamp Nos. P 01350 - P 01351
  - g. 06/03/97 - 07/31/97 Bates Stamp Nos. P 01352 - P 01353
  - h. 08/01/97 - 08/31/97 Bates Stamp Nos. P 01354
  - i. 09/19/97 - 10/31/97 Bates Stamp Nos. P 01355 - P 01356
  - j. 11/03/97 - 11/30/97 Bates Stamp Nos. P 01357 - P 01358
  - k. 12/01/97 - 12/31/97 Bates Stamp Nos. P 01359
  - l. 01/02/98 - 01/31/98 Bates Stamp Nos. P 01360 - P 01361
  - m. 01/19/98 - 02/28/98 Bates Stamp Nos. P 01362 - P 01363
  - n. 03/05/98 - 03/31/98 Bates Stamp Nos. P 01364
  - o. 04/01/98 - 04/30/98 Bates Stamp Nos. P 01365
  - p. 05/01/98 - 05/31/98 Bates Stamp Nos. P 01366
  - q. 06/01/98 - 06/30/98 Bates Stamp Nos. P 01367
  - r. 07/01/98 - 07/31/98 Bates Stamp Nos. P 01368
  - s. 08/01/98 - 08/31/98 Bates Stamp Nos. P 01369 - P 01370
  - t. 09/01/98 - 09/30/98 Bates Stamp Nos. P 01371 - P 01372
  - u. 10/01/98 - 10/31/98 Bates Stamp Nos. P 01373 - P 01374
  - v. 11/01/98 - 12/31/98 Bates Stamp Nos. P 01375 - P 01379
  - w. 11/01/98 - 12/30/98 Bates Stamp Nos. P 01380 - P 01391
  - x. 01/01/99 - 01/31/99 Bates Stamp Nos. P 01392 - P 01402
  - y. 02/01/99 - 02/28/99 Bates Stamp Nos. P 01403 - P 01405
  - z. 02/01/99 - 02/28/99 Bates Stamp Nos. P 01406 - P 01420
  - aa. 03/01/99 - 03/31/99 Bates Stamp Nos. P 01421 - P 01423
  - bb. 02/19/99 - 03/31/99 Bates Stamp Nos. P 01424 - P 01446
  - cc. 04/01/99 - 04/30/99 Bates Stamp Nos. P 01447 - P 01449
  - dd. 04/01/99 - 04/30/99 Bates Stamp Nos. P 01450 - P 01475

ee.	04/26/99 - 05/31/99	Bates Stamp Nos. P 01476 - P 01478
ff.	04/26/00 - 05/31/00	Bates Stamp Nos. P 01479 - P 01506
gg.	05/17/99 - 06/30/99	Bates Stamp Nos. P 01507 - P 01509
hh.	05/17/99 - 06/30/99	Bates Stamp Nos. P 01510 - P 01538
ii.	07/01/99 - 07/28/99	Bates Stamp Nos. P 01539 - P 01575
jj.	07/29/99 - 09/17/99	Bates Stamp Nos. P 01576 - P 01600
kk.	09/20/99 - 10/31/99	Bates Stamp Nos. P 01601 - P 01610
ll.	11/01/99 - 11/30/99	Bates Stamp Nos. P 01611 - P 01616
mm.	12/01/99 - 12/31/99	Bates Stamp Nos. P 01617 - P 01627
nn.	01/03/00 - 01/31/00	Bates Stamp Nos. P 01628 - P 01637
oo.	02/01/00 - 02/29/00	Bates Stamp Nos. P 01641 - P 01645
pp.	03/07/00 - 03/31/00	Bates Stamp Nos. P 01638 - P 01640
qq.	04/10/00 - 04/30/00	Bates Stamp Nos. P 01646 - P 01650
rr.	05/01/00 - 05/31/00	Bates Stamp Nos. P 01651 - P 01655

104. Strasburger & Price Law Firm Invoices in *General Motors v. AEEC* litigation
  - a. 07/30/99 - 09/17/99 Bates Stamp Nos. P 05033 - P 05035
  - b. 07/30/99 - 09/17/99 Bates Stamp Nos. P 05036 - P 05042
  - c. 09/24/99 - 10/31/99 Bates Stamp Nos. P 05043 - P 05045
  - d. 11/02/99 - 11/30/99 Bates Stamp Nos. P 05046 - P 05054
  - e. 12/01/99 - 12/31/99 Bates Stamp Nos. P 05055 - P 05062
  - f. 01/03/00 - 01/31/00 Bates Stamp Nos. P 05063 - P 05074
  - g. 02/01/00 - 02/29/00 Bates Stamp Nos. P 05075 - P 05088
  - h. 03/01/00 - 03/31/00 Bates Stamp Nos. P 05089 - P 05108
  - i. 04/03/00 - 04/30/00 Bates Stamp Nos. P 05109 - P 05123
  - j. 05/01/00 - 05/31/00 Bates Stamp Nos. P 05124 - P 05139
  - k. 06/01/00 - 06/30/00 Bates Stamp Nos. P 05140 - P 05153
  - l. 06/14/00 - 07/31/00 Bates Stamp Nos. P 05154 - P 05165
  - m. 07/31/00 - 08/31/00 Bates Stamp Nos. P 05166 - P 05187
  - n. 09/01/00 - 09/30/00 Bates Stamp Nos. P 05188 - P 05204
105. Gibraltar Chemical Resources Spill Report Summary  
Bates Stamp Nos. P 01656 - P 01663
106. Gibraltar Chemical Resources, Inc. Compliance with Laws – Alleged violations of Environmental Regulations at permitted TSDF (Solid Waste Registration Number 32123 January 1, 1989 through August 25, 1994)  
Bates Stamp Nos. GM 2<sup>nd</sup> RFP # 1 000001 - 000025
107. Master List of GCR Regulatory Issues  
Mitchael Wilson Deposition Exhibit No. 6

108. 06/09/90 GCR Incident Report from Billy Duffy to James Waldron regarding 06/08/90 incident
109. 07/09/90 Terrence M. Davis (GCR) letter to Richard Leard (TACB) regarding 06/08/90 incident
110. 07/06/90 Mitcheal Wilson (GCR) letter to Thomas W. Weber (TWC) regarding 06/23/90 incident
111. 06/22/90 Uniform Hazardous Waste Manifest No. 99142289 from Aptus to GCR
112. 10/18/91 Region 12 Upset/Maintenance Telephone Notification Form re: 10/18/91 GCR incident
113. 10/28/91 Maurice Blanton Employee Accident Review regarding 10/18/91 incident
114. 02/11/92 Terrence M. Davis (GCR) letter to Mike Brashear (TWC) regarding 10/18/91 incident
115. 10/08/91 Dave Durakovich GCR Interoffice Memorandum to Terry Davis regarding 11/07/91 incident
116. 12/10/91 Terrence M. Davis (GCR) letter to John W. Witherspoon (TEC) regarding 11/07/91 incident
117. 03/26/92 Herman Cryer GCR Supervisor's Accident Investigation Report
118. 04/09/92 Arthur Fokakis III (GCR) letter to John W. Witherspoon (TWC) regarding 03/26/92 incident
119. Ronnie Williams memo regarding TR 207 Mobil Chemical BCSP HWCDF No. 18185 07/10/92 incident
120. 07/16/92 Region 12 GCR Investigation/Violation Form No. 971577A regarding 07/10/92 incident
121. 07/20/92 Irene Hadley GCR Interoffice Memorandum to Bill Kitto regarding 07/09/92 incident
122. Final investigation report regarding 07/10/92 incident
123. 11/02/92 Terrence M. Davis (GCR) letter to Richard G. Leard, P.E. (TACB) regarding 07/10/92 incident

124. 01/07/93 Richard Leard memorandum regarding Tank 122 chemical reaction
125. 01/22/93 Terrence M. Davis (GCR) letter to John W. Witherspoon (TWC) regarding 01/07/93 incident
126. 06/23/93 memo regarding 07/15/93 incident
127. 06/16/93 GCR Supervisor's Incident Investigation Report regarding 06/15/93 incident
128. 06/??/93 Lynn Goldston (GCR) e-mail message to Art Fokakis (GCR) re: 06/14/93 T-127 problem
129. 06/21/93 Bob Mann (GCR) e-mail message to Art Fokakis (GCR) re: T-102 & T-127 fumes
130. 09/09/93 Jack Robinson (GCR) e-mail message to Kenny Saxon, et al (GCR) regarding Tank 230 incident
131. Chronology of Events with Tank 230
132. 09/23/93 Terrence M Davis (GCR) letter to Anthony Grigsby (TNRCC) regarding 09/09/93 incident
133. 09/16/93 Lynn Goldston GCR Supervisor's Incident Investigation Report regarding 06/15/93 incident
134. 10/93 Billy Duffey GCR Supervisor's Incident Investigation Report regarding 10/25/93 incident
135. 12/10/93 GCR Spill Reporting Form regarding T103/T123 containment area